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EG&G ROCKY FLATS, INC. ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

January 7, 1991

90-RF-7437

Robert M. Nelson, Jr. Manager DOE, RFO

RESPONSE TO SCHNOOR LETTER, CITY OF BROOMFIELD

We have prepared a reply to the November 6, 1990, letter from K. Schnoor, City of Broomfield. The letter identifies several issues, both technical and administrative. Our advice for reply to each is presented in the enclosed attachment. Specifically, we have identified the following issues:

- 1. "This (hydraulic isolation of GWR & Standley Lake) is necessary to insure that there will be no further impact on drinking water..."; (emphasis added)
- 2. Implementation of both Options "B" and "J" is necessary to protect the surrounding communities:
- 3. Diversion of Woman Creek water to Walnut Creek (Interbasin Diversion) should not be considered until funding for Options "B" and "J" is fully committed;
- 4. If Woman Creek water becomes contaminated (before or during transfer to Walnut Creek) there are no provisions for treatment;
- 5. Deficiencies in the pumping plan include the lack of provisions for pumping in freezing weather:
- 6. Interbasin transfer is considered unacceptable to Broomfield during the OU2 IRA until funding for "B" & "J" is in place;
- 7. "...protocol for routine discharges, application of Water Quality Control Commission stream standards to discharges, and treatment of discharges that don't meet standards" require resolution;
- 8. "Allowing the ponds to fill up until the dam integrity is in question is not good routine operating procedure";
- 9. The Colorado Department of Health's data should be used to determine if the discharge meets the WQCC standards, and:
- 10. "Treatment systems in place at the ponds are not functioning as expected..."

HORIZED CLASSIFIER SIGNATURE

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ASSIFICATION:

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NEIDENTIAL

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Additionally, changes in policy regarding discharge procedures were mentioned. The letter claimed that the City has experienced problems with timely notification of our intent to discharge, and their ability to access their sampling station on Walnut Creek. We suggest that DOE may want to institute a written policy for the City's access documenting their access authorization and their responsibilities. We are, of course, ready to cooperate to help resolve this issue and suggest that RFO's approach to part 39 of the IAG, "access", may be a very appropriate way to resolve this issue. Specifically, RFO letter, November 10, 1990, to CDH and EPA describes the procedures and responsibilities for visitors. We believe that it may be convenient and effective for your office to expand this document to include other authorized site visitors. A copy is attached for your convenience.

If you have any questions, please call Bob James of my staff at extension 5006.

J. M. Kersh, Associate General Manager

Environmental Restoration & Waste Management

EG&G Rocky Flats

REJ:vbs

Orig. and 1 cc - R. M. Nelson, Jr.

Attachments:

As Stated

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T. Lukow, RFO

J. Rampe, RFO